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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 CENTER FOR BIOLOGICAL DIVERSITY,

12 Plaintiff,

13 vs.

14 UNITED STATES BUREAU OF LAND  
MANAGEMENT,

15 Defendant,

16 and

17 IONEER USA CORPORATION,

18 Defendant-Intervenor.  
19

Case No.: 2:19-cv-01915-GMN-EJY

**STIPULATED AGREEMENT AND  
SECOND EXTENSION OF  
DEADLINES [ECF NO. 18] TO  
FACILITATE SETTLEMENT  
DISCUSSIONS**

20 Plaintiff Center for Biological Diversity (“the Center”), Federal Defendant United States  
21 Bureau of Land Management (“BLM”), and Defendant-Intervenor Ioneer USA Corporation  
22 (“Ioneer”) (collectively the “Parties”) agree and stipulate as follows:

23 **WHEREAS**, the Parties previously submitted a Stipulated Agreement and Briefing  
24 Schedule for Motion for Preliminary Injunction and [Proposed] Order [ECF No. 9], whereby: (1)  
25 Ioneer represented it would not conduct any additional ground disturbing activities pursuant to the  
26 Rhyolite Ridge Exploration Project (Notice NVN-097202) or the South Infill Exploration Project  
27 (Notice NVN-097262) for the next 35 days, from November 5, 2019 to December 10, 2019; (2)  
28 Ioneer represented the only activities that will be conducted by Ioneer during those next 35 days

1 would be continued work on two water bores that are already in place and during the course of  
2 conducting those activities, Ioneer would continue to comply with the existing requirements of the  
3 Notices NVN-097202, and NVN-097262 and any applicable statutes and regulations; (3) the Center  
4 represented that it would not file a motion for a temporary restraining order during the same time  
5 period; and (4) the Center represented it would not oppose a motion to intervene in this case by  
6 Ioneer. The agreement further provided a briefing schedule such that the Center would file its  
7 motion for a preliminary injunction on or before November 5, 2019, the BLM and Ioneer would  
8 file their responses on or before November 19, 2019, and the Center would file its reply on or  
9 before November 26, 2019.

10 **WHEREAS**, the Parties previously agreed to an extension of the previous deadlines [ECF  
11 No. 18], such that Ioneer represented that it would not conduct any additional ground disturbing  
12 activities pursuant to the Rhyolite Ridge Exploration Project (Notice NVN-097202) or the South  
13 Infill Exploration Project (Notice NVN-097262), from November 5, 2019 to January 10, 2020;  
14 that the only activities that will be conducted by Ioneer during this November 15, 2019, to January  
15 10, 2020, time period, will be continued work on two water bores that are already in place; that  
16 during the course of conducting these activities, Ioneer will continue to comply with the existing  
17 requirements of the Notices NVN-097202, and NVN-097262 and any applicable statutes and  
18 regulations; and that the Center would not file a motion for a temporary restraining order during  
19 this November 15, 2019, to January 10, 2020, time period.

20 **WHEREAS**, the Parties seek a second extension of the briefing deadline [ECF No. 18], to  
21 facilitate settlement discussions that would serve the interests of preserving judicial and the parties'  
22 resources.

23 **THEREFORE**, the Parties agree and stipulate:

24 1. If the Parties are unable to reach a settlement in principle, BLM and Ioneer  
25 will file their responses to the Center's motion for a preliminary injunction on or before  
26 December 6, 2019.

27 2. The Center will file its reply brief on or before December 20, 2019.

1           3.       The Parties respectfully request that the Court set an argument date on the Center's  
2 motion for a preliminary injunction as early thereafter as possible.

3           4.       If Ioneer decides to proceed with additional ground disturbing activities after the  
4 November 15, 2019, to January 10, 2020, time period but prior to the Court's resolution of the  
5 Center's motion for a preliminary injunction, the Center will likely file a motion for a temporary  
6 restraining order at that time.

7 DATED this 2nd day of December, 2019.

8 /s/ E. Leif Reid

9 E. LEIF REID

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11 JOSH M. REID

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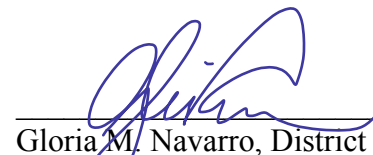
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*Counsel for Federal Defendants*

**IT IS SO ORDERED.**

Dated this 3 day of December, 2019.



Gloria M. Navarro, District Judge

UNITED STATES DISTRICT COURT